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11 Attorneys for Defendant THOMAS DUNDON

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 COLTON SCHMIDT, individually and on
behalf of others similarly situated; REGGIE
16 NORTHRUP, individually and on behalf of
others similarly situated,

17 Plaintiffs,

18 v.

19 AAF PLAYERS, LLC, a Delaware Limited
20 Liability Company, d/b/a/ The Alliance of
American Football; THOMAS DUNDON, an
21 individual; CHARLES "CHARLIE"
EBERSOL, an individual; LEGENDARY
22 FIELD EXHIBITIONS, LLC, a Delaware
Limited Liability Company; AAF
23 PROPERTIES, LLC, a Delaware Limited
Liability Company; EBERSOL SPORTS
24 MEDIA GROUP, INC., a Delaware
Corporation; and DOES 1 through 200,
25 inclusive,

26 Defendants.
27
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Case No. 3:19-cv-3666

[San Francisco County Superior Court Case
No. CGC-19-575169]

**DECLARATION OF LEILA NARVID IN
SUPPORT OF DEFENDANT'S PETITION
AND NOTICE OF REMOVAL OF CIVIL
ACTION UNDER 28 U.S.C. §§ 1332, 1441,
1446, 1453, 1711; and 28 U.S.C. §§ 1334,
1452**

DECLARATION OF LEILA NARVID

I, Leila Narvid, hereby declare and state as follows:

1. I am an attorney at law, duly licensed to practice before all courts in the State of California and the Northern District of California. I am a partner with the law firm of Payne & Fears LLP, attorneys of record for Defendant Thomas Dundon (“Defendant”).

2. I make this declaration in support of Defendant Thomas Dundon’s Petition and Notice of Removal of Civil Action Under 28 U.S.C. §§ 1332, 1441, 1446, 1453, 1711; and 28 U.S.C. §§ 1334, 1452. I am familiar with the facts and proceedings of this case and would testify competently from my personal knowledge if called to testify and sworn as a witness.

3. On or about April 10, 2019, Plaintiffs filed an action titled “*Colton Schmidt, individually and on behalf of others similarly situated; Reggie Northrup, individually and on behalf of others similarly situated v. AAF Players, LLC, a Delaware Limited Liability Company, d/b/a/ The Alliance of American Football; Thomas Dundon, an individual; Charles “Charlie” Ebersol, an individual; Legendary Field Exhibitions, LLC, A Delaware Limited Liability Company; AAF Properties, LLC, a Delaware Limited Liability Company; Ebersol Sports Media Group, Inc., a Delaware Corporation; and Does 1 through 200, inclusive,*” in the Superior Court of the State of California, County of San Francisco, Case No. CGC-19-575169 (the “State Court Action”). A true and correct copy of the original Complaint, Summons, and Civil Case Cover Sheet that were filed is attached to the Notice of Removal, filed concurrently herewith, as **Exhibit “A”** as part of the Index of Exhibits.

4. Defendant Dundon was served with a copy of Plaintiff’s Complaint and Summons on May 24, 2019.

5. On or about April 10, 2019, the Superior Court issued a Notice to Plaintiff of a Case Management Conference scheduled for September 11, 2019 in Department 610 of the San Francisco County Superior Court. A true and correct copy of the Notice to Plaintiff is attached to the Notice of Removal as **Exhibit “B”** as part of the Index of Exhibits.

6. On or about May 14, 2019, the Superior Court issued an Order Denying Complex Designation for Failure to File Application Requesting Designation. A true and correct copy of the Superior Court’s Order is attached to the Notice of Removal as **Exhibit “C”** as part of the Index of Exhibits.

7. On or about May 29, 2019, Plaintiffs filed a Notice and Acknowledgment of Receipt of Summons and Complaint to Dundon. A true and correct copy of the Notice and Acknowledgment of Receipt is attached to the Notice of Removal as **Exhibit “D”** as part of the Index of Exhibits.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed in San Francisco, California on June 24, 2019.

By: /s/ Leila Narvid
LEILA NARVID

PROOF OF SERVICE

Colton Schmidt, etc., et al. v. AAF Players, LLC, etc., et al.
United States District Court, Northern District Case No. 3:19-cv-3666

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is Jamboree Center, 4 Park Plaza, Suite 1100, Irvine, CA 92614.

On June 24, 2019, I served true copies of the following document(s) described as **DECLARATION OF LEILA NARVID IN SUPPORT OF DEFENDANT'S PETITION AND NOTICE OF REMOVAL OF CIVIL ACTION UNDER 28 U.S.C., §§ 1332, 1441, 1446, 1543, 1711, ET SEQ.; AND 28 U.S.C. §§ 1334, 1452** on the interested parties in this action as follows:

Boris Treyzon, Esq.
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Attorneys for Plaintiff STEVE
ENRIQUEZ

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the address listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Payne & Fears LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 24, 2019, at Irvine, California.

/s/ Terri M. Shaw

Terri M. Shaw